Date: 1/2/07

IN WITNESS WHEREOF, the undersigned have caused this Settlement

Agreement to be executed as of the dates set forth below:

FOR THE FREY DEFENDANTS:	FOR THE RANDOM HOUSE DEFENDANTS
James Frey	Robert Sorrentino
1/2/2	Senior Vice President, Taxes, Random House, Inc.
Date: 1/2/07	Date:
James Frey Big Jim Industries, Inc.	Robert Sorrentino
Date: 1/2/07	President, Doubleday & Company, Inc.
Date: 1 / 2 / 0 +	Date:
In Rhu	
Maya Frey	Robert Sorrentino
	Vice President, Taxes, Random House VG, Inc.
Date: 1/2/07	
	Date:
- Perel Meyer	
Derek J. Meyer	Mark B. Blocker
McDermott Will & Emery LLP	Sidley Austin LLP
227 West Monroe Street, Suite 4400	One South Dearborn
Chicago, Illinois 60606	Chicago, Illinois 60603
Attorney for the Frey Defendants	Attorney for the Random House Defendants

Date:_____

IN WITNESS WHEREOF, the undersigned have caused this Settlement

Agreement to be executed as of the dates set forth below:

FOR THE FREY DEFENDANTS:	FOR THE RANDOM HOUSE DEFENDANTS:
James Frey	Robert Sorregano Senior Vice President, Taxes, Random House, Inc.
Date:	Date: 12/15/06
James Frey	Robert Sorrenting
Big Jim Industries, Inc.	President, Doubleday & Company, Inc.
Date:	Date: 12/15/06
Maya Frey	Robert Sorrentino Vice President, Taxes, Random House VG, Inc.
Date:	Mark B Blocker
WOOD CONTRACTOR OF THE PARTY OF	Mark & Blocker
Derek J. Meyer McDermott Will & Emery LLP	Mark B. Blocker
227 West Monroe Street, Suite 4400	Sidley Austin LLP One South Dearborn
Chicago, Illinois 60606	Chicago, Illinois 60603
Attorney for the Frey Defendants	Attorney for the Random House Defendants
Date:	Date: 12/28/2006

FOR	THE	PLA	INT	FFE
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Plaintiff Marcha Vedral	Michele Snow
Carry D. Brinn: Larry D. Drury 1.td. 265 W. Randolph Street. Suite 1430 Chicago. Himois 60606 Proposed Co-Leud Class Counsel Attorney for Plaintiff Marcia Vedral	Evan J. Smith. Lisquire Brodsky & Smith. LLC Two Bala Plana. Suite 602 Bala Cynwyd. PA 19004 (610) 667-6200 Proposed Co-Lead Class Comsel Attorney for Plaintiff Michele Snow
Date: 12-6-06	Date: 12-6-06
Plaintiff Jennifer Colun Date:	Plaintiff Ann Marie Strack Date:
Thomas Mulianey 708 Third Avenue, Suite 2500 New York, New York 10017 Phone: (212) 223-0800 Liuison Class Counsel Attorneys for Plaintiff Jennifer Cohn	Thomas A. Zimmerman, Jr. Zimmerman and Associates, P.C. 100 West Monroe Street, Suite 1300 Chreago, Himors 60603 Attorney or Plaintiff Ann Marie Street
Date:	Date:

FOR THE PLAINTIFFS:

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Plaintiff Marcia Vedral	Plaintiff Michele Snow
Date:	Date:
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Larry D. Drury	Evan J. Smith, Esquire
Larry D. Drury Ltd.	Brodsky & Smith, LLC
205 W. Randolph Street, Suite 1430	Two Bala Plaza, Suite 602
Chicago, Illinois 60606	Bala Cynwyd, PA 19004
Proposed Co-Lead Class Counsel	(610) 667-6200
Attorney for Plaintiff Marcia Vedral	Proposed Co- Lead Class Counsel
	Attorney for Plaintiff Michele Snow
Date:	Date:
Plaintiff Diane Marolda	Plaintiff Ann Marie Strack
Date: 12/1/06	Date:
Thomas Mullaney	Thomas A. Zimmerman, Jr.
708 Third Avenue, Suite 2500	Zimmerman and Associates, P.C.
New York, New York 10017	100 West Monroe Street, Suite 1300
Phone: (212) 223-0800	Chicago, Illinois 60603
Liaison Class Counsel Attorneys for Plaintiff Diane Marolda	Attorney or Plaintiff Ann Marie Strack
Date: 12 5 7/2V	Data

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FOR THE PLAINTIFFS:

Plaintiff Marcia Vedral	Plaintiff Michele Snow
Date:	Date:
Larry D. Drury Larry D. Drury Ltd. 205 W. Randolph Street, Suite 1430 Chicago, Illinois 60606 Proposed Co-Lead Class Counsel Attorney for Plaintiff Marcia Vedral	Evan J. Smith, Esquire Brodsky & Smith, LLC Two Bala Plaza, Suite 602 Bala Cynwyd, PA 19004 (610) 667-6200 Proposed Co- Lead Class Counsel
Date:	Attorney for Plaintiff Michele Snow
Plaintiff Jennifer Cohn	Plaintiff Ann Marie Strack
Date:	Date: 12-8-06
Thomas Mullaney 708 Third Avenue, Suite 2500 New York, New York 10017 Phone: (212) 223-0800 Liaison Class Counsel Attorneys for Plaintiff Jennifer Cohn	Thomas A. Zimmerman, Jr. Zimmerman and Associates, P.C. 100 West Monroe Street, Suite 1300 Chicago, Illinois 60603 Attorney or Plaintiff Ann Marie Strack
Date:	Date: 12-11-2006

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Plaint I Jimpy Hoyd	Plaintiff Jill Giles
Dest 1/4/07 - 1	Date:
Alan S. Ripka Napoli Bern Ripka LLP 115 Broadway	Alan J. Statman Colleen M. Hegge (of counsel) 2900 Chemed Center
New York, New York 10006 Attorney for Plaintiff Jimmy Floyd	255 East Fifth Street Cincinnati. Ohio 45202 Attorneys for Plaintiff Jill Giles
Date: December 5, 2006	Date:
Plaintiff Pilar More	Plaintiff Shera Paglinawan
Date:	Date:
Thomas E. Pakenas Dale and Pakenas 641 W. Lake Street, Suite 400 Chicago, Illinois 60661 Attorneys for Plaintiff Pilar More	Michael David Myers Myers & Company, P.L.L.C. 1809 Seventh Avenue, Suite 700 Scattle, Washington 98101 Attorney for Plaintiff Shera Paglinawan
Date:	Date:
Plaintiff Sara Brackenrich	
Date:	
Vincent L. DiTommaso DiTommaso & Lubin, PC 17W 220 22nd Street, Suite 200 Oakbrook Terrance, Illinois 61081 Attorney for Plaintiff Sara Brackenrich	

Date:_

Plaintiff Jimmy Floyd	Plaintiff Jill Giles
Date:	Date:
Alan S. Ripka Napoli Bern Ripka LLP 115 Broadway New York, New York 10006 Attorney for Plaintiff Jimmy Floyd	Alan J. Statman Colleen M. Hegge (of counsel) 2900 Chemed Center 255 East Fifth Street
Date: 11/29/06	Cincinnati, Ohio 45202 Attorneys for Plaintiff Jill Giles Date:
Plaintiff Pilar More Date: 11 29/06	Plaintiff Shera Paglinawan Date:
Thomas E. Pakenas Dale and Pakenas 641 W. Lake Street, Suite 400 Chicago, Illinois 60661 Attorneys for Plaintiff Pilar More Date:	Michael David Myers Myers & Company, P.L.L.C. 1809 Seventh Avenue, Suite 700 Seattle, Washington 98101 Attorney for Plaintiff Shera Paglinawan Date:
Plaintiff Sara Brackenrich Date:	
Vincent L. DiTommaso DiTommaso & Lubin, PC 17W 220 22nd Street, Suite 200 Dakbrook Terrance, Illinois 61081 Attorney for Plaintiff Sara Brackenrich Date:	

Plaintiff Jimmy Floyd	Plaintiff Jill Giles
Date:	Date:
Alan S. Ripka	Alan J. Statman
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115 Broadway	2900 Chemed Center
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Attorney for Plaintiff Jimmy Flayd	Cincinnati, Ohio 45202
	Attorneys for Plaintiff Jill Giles
Date:	Date:
Plaintiff Pilar More	Plaintiff Shera Paglinawan
Date:	Date:
Thomas E. Pakenas Dale and Pakenas 641 W. Lake Street, Suite 400 Chicago, Illinois 60661 Attorneys for Plaintiff Pilar More	Plaintiff Wendy Shaw Date:
Date:	Michael David Myers
S. P. C.	Myers & Company, P.L.L.C.
	1809 Seventh Avenue, Suite 700
	Seattle, Washington 98101
	Attorney for Plaintiff Shera Paglinawan
C P,	Date:
Plaint F Sara Brackenrich	
Date: 20 Nov. 06	
Date: 6/0 Nov. OL	
Difformaso & Lubin, PC	ment :

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Plaintiff Jimmy Floyd	Flaintiff Jill Giles
Date:	Date: 12 - 7-0 6
Alan C Dist.	1 2
Alan S. Ripka	Alan Statman
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115 Broadway	2900 Chemed Center
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Attorney for Plaintiff Jimmy Floyd	Cincinnati, Ohio 45202
	Attorneys for Plaintiff Jill Giles
Date:	Date: 12-7-04
Plaintiff Piler More	Plaintiff Shera Paglinawan
Date:	Date:
Thomas E. Pakenas Dale and Pakenas 641 W Lake Street, Suite 400 Chicago, Illinois 60661 Attorneys for Plaintiff Pilar More Date:	Michael David Myers Myers & Company, P. L. C 1809 Seventh Avenue, Suite 700 Seattle, Washington 98101 Attorney for Plaintiff Shera Paglinawan Date:
Plaintiff Sara Brackenrich	
Date:	
Vincent L. DiTommaso	•
DiTommaso & Lubin, PC	
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Attorney for Plaintiff Sara Brackenrich	
Date:	

Plaintiff Jimmy Floyd	Plaintiff Jill Giles
Date:	rankin Jill Giles
	Date:
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Attorney for Plaintiff Jimmy Floyd	255 East Fifth Street
w commy ruya	Cincinnati, Ohio 45202
	Attorneys for Plaintiff Jill Giles
Date:	y or raming Jul Gues
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Plaintiff Pilar More	Ann Fo.
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Pate	Plaintiff Shera Paginawan
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Pale and Pakense	Plaintiff Wendy Shaw
41 W. Lake Street, Suite 400	" Sligy Sligw
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ate:	Mint to Alle us
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	Seattle West in Avenue, Suite 700
	Seattle, Washington 98101
	Attorney for Plaintiff Shera Paglinawan
	Date: 12 . 3 . 2006
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cent L. DiTommaso	

Date:
Alan J. Statmon
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255 East Fifth Street
Cincirnati, Ohio 45202
Attorneys for Plaintiff Jill Giles
Date:
Plaintiff Shera Paglinawan
Date:
Plaintiff Wondy Shaw Date: 2/2/06
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Assurney for Platnitff Shera Paglinawan
Date: